



July 29 2019

*VIA ELECTRONIC MAIL*

Southern California Association of Governments  
818 West 7th Street, 12th Floor  
Los Angeles, California 90017

**RE: Draft Regional Housing Needs Assessment methodology**

Gentlepersons:

The three options developed are all backward looking and simply reinforce and magnify existing trends. These trends are punishing commutes, intractable jobs-housing imbalance, and automobile dependency with decreasing transit ridership. These trends are accompanied by lack of low and moderate income housing.

The draft methodology allocates units predominantly – upwards of 70% – on the basis of population, that is, *growth goes where it has been going*. A small percent is allocated to transit accessibility. And *no* allocation is given based on the location of jobs.

This retrogressive and counterproductive mythology is at odds with forward looking councils of government, such as in San Diego, where the draft methodology shows 65% is transit and 35% is jobs-based, along with an equity adjustment.

The draft RHNA ill-serves the region and is a formula for perpetuation of the region's current ills. Leadership at SCAG – both elected officials and management – should immediately force a reassessment given this impending planning failure.

Yours truly,

Dan Silver  
Executive Director